

Jeanette E. McPherson, Esq., NV Bar No. 5423  
 Schwartz & McPherson Law Firm  
 2850 S. Jones Blvd., Suite 1  
 Las Vegas, NV 89146  
 Phone: 702-228-7590 / Fax: 702-892-0122  
 E-Mail: [bkfilings@s-mlaw.com](mailto:bkfilings@s-mlaw.com)  
*Attorneys for Yvette Weinstein, Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT  
 DISTRICT OF NEVADA**

In re:

Lionel Sawyer & Collins, Ltd.,

Debtor.

Case No. BK-S-15-10462-MKN

Chapter 7

Adversary No.

Yvette Weinstein, Chapter 7 Trustee,

Plaintiff,

v.

1224 LTD Consulting; Amerco Real Estate  
 Company; Amy Julien; Amy Lucier; Andrew B.  
 Donner; Anthony London; Apex Clean Energy,  
 Inc.; Arbor Foundation; Armando Rodriguez;  
 ASTOUND Group, Inc; Bruce Wisner; Bryce L.  
 Tirrell; Capital Health Group LLC; Casino  
 Services Publishing, LLC; Cerebrus Holdings,  
 LLC; CMA Consulting; Cynthia Matheus; Dale  
 Howard; David Leonardi; Deli Planet, Inc.;  
 Desert Restaurant Group, LLC; DF, LLC;  
 Douglas R. Eisner; Dustin Metcalf; Dwight  
 Meierhenry & Barbara Meierhenry; Eliezer  
 Mizrahi; Elliot A. Harris and Anita B. Harris;  
 Evergreen International Aviation; Familian  
 Development Group; Forever Green NV, a  
 Nevada corporation; I. Heidi Loeb Hegerich;  
 Frank J. Catanzarite; Frias Holding Company; G2  
 Game Design, LLC; Gerald Thornton; Gerardo  
 Borrego; Greenwood Hall, Inc.; H2O  
 Conservation Ltd.; Howard L. Abselet; iPro, Inc.;  
 JA Energy; Jean Phillips; John J. Cahill, Public  
 Administrator; John Kilpatrick; John P. Furlong  
 and Kimberly L. Furlong; Jonathan Baktari; Joyce  
 Issaq; Julie Summerville; Kexuan Yao and  
 William Thompson; Luis Munoz & Luz Munoz;  
 Mark Stiffler; Michael Price and Danielle Price;  
 Michael B. Eckerman; Michael Duncan; Michael  
 Mosca; Michael Reiss; Milton Christenson;

**COMPLAINT FOR MONIES OWED**

SCHWARTZ & MCPHERSON LAW FIRM

2850 S. Jones Blvd., Suite 1

Las Vegas, Nevada 89146

Tel: (702) 228-7590 · Fax: (702) 892-0122

1 Momeni & Associates, Inc.; Mountainside Health  
 2 Center NV, LLC; Moveline Group, Inc., a  
 3 Delaware corporation; Nannies & Housekeepers,  
 4 LLC; Nevada Alliance of Boys & Girls Clubs;  
 5 Nevada Association of Health Facilities; Patricia  
 6 Ann Thompson; Pemberton Fine Wine and  
 7 Spirits, LLC; Prestige Capital Fund, LLC; Public  
 8 House Las Vegas LLC; Rainbow Andreani;  
 9 Rainbow Hotel, LLC; Ray O'Donnell; Rhonda  
 10 Mushkin; Robert Hamrick and Molly Hamrick;  
 11 Ronald Tassinari & Audrey Tassinari; Scott  
 12 Sibley; Sheila M. Matherly; SRS Holdings;  
 13 Sterling Senior Communities; Suning Universal  
 Co., Ltd.; T.A.C.T. USA Inc.; Ted Lachowicz  
 and Cheryl I Lachowicz; Thomas M. McIntosh,  
 Attorney at Law; Tracy Westen and Linda  
 Lawson; Waterton Global Value, L.P. & Borealis  
 Mining Co. LLC; Weir Foulds, LLP; Whittier  
 Trust Company of Nevada; Yunli Moy; DOE  
 individuals 1-10; and ROE corporations 1-10,  
 Defendants.

14 Plaintiff Yvette Weinstein ("Trustee" or "Plaintiff"), in her capacity as Chapter 7 Trustee of  
 15 Lionel Sawyer & Collins, Ltd. ("LSC"), by and through her counsel submits this Complaint For  
 16 Monies Owed against defendants, as set forth above and more fully set forth on **Exhibit 1**<sup>1</sup> attached  
 17 hereto and made a part hereof (each a "Defendant" and collectively, the "Defendants"), and alleges as  
 18 follows:

### 19 JURISDICTION AND VENUE

20 1. LSC filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code on  
 21 January 30, 2015 (the "Petition Date").

22 2. The United States Bankruptcy Court for the District of Nevada (the "Bankruptcy  
 23 Court") has subject matter jurisdiction over this adversary proceeding pursuant to 28 U.S.C. §§ 157  
 24 and 1334(b).

25 3. This adversary proceeding concerns a matter which is related to the administration of  
 26 \_\_\_\_\_

27 <sup>1</sup> Exhibit 1 contains an alphabetical listing (by business or first name of Defendant) of each Defendant, along with a  
 28 summary of the fees, costs, and interest accrued pre-petition, along with the post-petition interest accrued for the  
 period of January 31, 2015 through October 31, 2016, which amounts continue to accrue.

1 the bankruptcy estate.

2 4. This adversary proceeding is a non-core proceeding.

3 5. The Plaintiff consents to the entry of a final judgment by this Court.

4 6. Venue in this district is proper pursuant to 28 U.S.C. § 1409.

5 7. This adversary proceeding is brought pursuant to Fed.R.Bankr. P. 7001(1) and 11  
6 U.S.C. § 541(a) to collect a sum of money owed to the bankruptcy estate.

7 8. The Court has authorized the filing of this adversary proceeding pursuant to the Order  
8 Granting Motion For Approval To File Consolidated Adversary (Dkt. No. 568) entered on the Court's  
9 docket on December 23, 2015.

10 **PARTIES TO THE PROCEEDING**

11 9. Plaintiff is the duly appointed and acting trustee in the case of LSC.

12 10. Defendant(s) is an individual residing in or an entity doing business in the United  
13 States of America who obtained services from LSC.

14 11. That the true names and capacities, whether individual, corporate, associate or  
15 otherwise of Defendants named herein as DOE individuals 1 through 10 and ROE corporations 1  
16 through 10, inclusive are unknown to Debtor who, therefore sues said Defendants by such fictitious  
17 names and Debtor will ask leave to amend this Complaint to show their true names and capacities  
18 when the same have been ascertained. Debtor believes that each Defendant named as a DOE or ROE  
19 may have dominion and control of the property or may be responsible in some manner for the events  
20 herein referred to and caused damages proximately thereby to Debtor as alleged herein.

21 **STATEMENT OF FACTS**

22 12. Prior to the Petition Date, LSC provided legal services to and incurred costs on behalf  
23 of Defendant(s).

24 13. Prior to the Petition Date, LSC tendered invoices for such legal services to  
25 Defendant(s) ("Invoices").

26 14. As of the Petition Date, an unpaid balance was owed by Defendant(s) for the legal  
27 services and costs provided by LSC to Defendant(s) with interest accruing thereafter at the rate of  
28 12% per annum ("Unpaid Balance"). See Exhibit 1.

15. Trustee's counsel has sent Defendant(s) a demand requesting payment of the balance owed to LSC.

16. Defendant(s) has not paid the Unpaid Balance.

**FIRST CLAIM FOR RELIEF**

**(Monies Due and Owing)**

17. Plaintiff repeats and realleges each and every allegation contained in the paragraphs set forth above as set forth herein.

18. Defendant(s) owes the bankruptcy estate the Unpaid Balance for legal services rendered and costs incurred for the benefit of Defendant(s).

**SECOND CLAIM FOR RELIEF**

**(Account Stated)**

19. Plaintiff repeats and realleges each and every allegation contained in the paragraphs set forth above as set forth herein.

20. Defendant(s) owes the bankruptcy estate the Unpaid Balance based on the Invoices.

**THIRD CLAIM FOR RELIEF**

**(Breach of Contract)**

19. Plaintiff repeats and realleges each and every allegation contained in the paragraphs set forth above as set forth herein.

20. LSC agreed to provide legal services and expend costs for the benefit of Defendant(s).

21. Defendant(s) agreed to pay for the legal services and costs provided to him by LSC.

22. Defendant(s) failed to pay for the legal services and costs.

23. By failing to pay LSC for the legal services and costs owed to it, Defendant(s) breached the terms of the agreement with LSC.

24. As a direct and proximate cause of Defendant's breach of the agreement to pay LSC for the legal services and costs, the LSC bankruptcy estate has been damaged in the amount of the Unpaid Balance.

///

///

**FOURTH CLAIM FOR RELIEF**

**(Breach of the Implied Covenant of Good Faith And Fair Dealing)**

25. Plaintiff repeats and realleges each and every allegation contained in the paragraphs set forth above and as set forth herein.

26. The agreement by LSC to provide legal services and costs to Defendant(s) and for Defendant(s) to pay for legal services and costs to LSC is valid and enforceable.

27. By failing to pay LSC for the legal services and costs, Defendant(s) breached the implied covenant of good faith and fair dealing contained in the agreement between the parties.

28. As a direct and proximate cause of Defendant's breach of the implied covenant of good faith and fair dealing under the agreement to pay LSC for legal services and costs, the LSC bankruptcy estate has been damaged in the amount of the Unpaid Balance.

**FIFTH CLAIM FOR RELIEF**

**(Unjust Enrichment/Quantum Meruit)**

29. Plaintiff repeats and realleges each and every allegation contained in the paragraphs set forth above and as set forth herein.

30. LSC provided legal services and incurred costs for the benefit of Defendant(s).

31. Defendant(s) agreed to pay for the legal services and costs.

32. Defendant(s) failed to pay for the legal services and costs.

33. By failing to pay LSC for the legal services and costs, Defendant(s) received and retained benefits for which she did not compensate LSC to the loss of LSC.

34. As a direct and proximate cause of Defendant's failure to pay for the legal services and costs to LSC, the LSC bankruptcy estate has been damaged in the amount of the Unpaid Balance.

**WHEREFORE**, Plaintiff respectfully requests the Bankruptcy Court enter judgment in favor of Plaintiff and against Defendant(s):

1. In the prepetition sum set forth on **Exhibit 1**;
2. For interest from January 31, 2015 at the rate of 12% per annum;
3. For reasonable attorneys' fees and costs;
4. For costs of suit; and

1 5. For such other and further relief as this Court deems just and proper.

2 Or, in the alternative, to submit proposed findings of fact and conclusions of law to the United  
3 States District Court for the District of Nevada recommending that the court enter judgment in favor of  
4 Plaintiff and against Defendant(s) as stated above.

5 Dated: November 16, 2016.

6 /s/ Jeanette E. McPherson

7 Lenard E. Schwartzter, Esq., NV Bar No. 0399

8 Jeanette E. McPherson, NV Bar No. 5423

9 Schwartzter & McPherson Law Firm

10 2850 S. Jones Blvd., Suite 1

11 Las Vegas, NV 89146

12 *Attorneys for Yvette Weinstein, Chapter 7 Trustee*

SCHWARTZER & MCPHERSON LAW FIRM

2850 S. Jones Blvd., Suite 1

Las Vegas, Nevada 89146

Tel: (702) 228-7590 · Fax: (702) 892-0122

Client Number	Defendant(s)	ICES	Costs	Prepetition Interest	Pre-Petition Sum	Daily Rate	Interest Accrued 01/03/15 thru 10/31/16	Total
23490	1224 LTD Consulting	\$ 1,943.75	\$ -	\$ 101.09	\$ 2,044.84	\$ 0.67	\$ 430.26	\$ 2,475.10
17591	Amerco Real Estate Company	\$ 4,625.00	\$ 49.43	\$ 46.74	\$ 4,721.17	\$ 1.55	\$ 993.39	\$ 5,714.56
24023	Amy Julien	\$ 1,096.00	\$ -	\$ -	\$ 1,096.00	\$ 0.36	\$ 230.61	\$ 1,326.61
24172	Amy Lucier	\$ 2,337.50	\$ -	\$ -	\$ 2,337.50	\$ 0.77	\$ 491.84	\$ 2,829.34
16330	Andrew B. Douner	\$ 1,725.00	\$ -	\$ -	\$ 1,725.00	\$ 0.57	\$ 362.96	\$ 2,087.96
22017	Anthony London	\$ 1,815.00	\$ 550.00	\$ 71.64	\$ 2,436.64	\$ 0.80	\$ 512.70	\$ 2,949.34
23730	Apex Clean Energy, Inc.	\$ 12,327.50	\$ 507.80	\$ -	\$ 12,835.30	\$ 4.22	\$ 2,700.69	\$ 15,535.99
23993	Arbor Foundation	\$ 1,487.50	\$ -	\$ 2.48	\$ 1,489.98	\$ 0.49	\$ 313.51	\$ 1,803.49
19976	Armando Rodriguez	\$ 3,628.37	\$ -	\$ 6,511.23	\$ 10,139.60	\$ 3.33	\$ 2,133.48	\$ 12,273.08
23365	ASTOUND Group, Inc	\$ 1,265.00	\$ -	\$ 45.96	\$ 1,310.96	\$ 0.43	\$ 275.84	\$ 1,586.80
19278	Bruce Wisner	\$ 812.50	\$ 150.36	\$ 101.42	\$ 1,064.28	\$ 0.35	\$ 223.94	\$ 1,288.22
24079	Bryce L. Tirrell	\$ 3,220.00	\$ 963.72	\$ -	\$ 4,183.72	\$ 1.38	\$ 880.30	\$ 5,064.02
23648	Capital Health Group LLC	\$ 2,995.56	\$ 5.21	\$ 23.34	\$ 3,024.11	\$ 0.99	\$ 636.31	\$ 3,660.42
23566	Cerebus Holdings, LLC	\$ 3,741.25	\$ 400.00	\$ -	\$ 4,141.25	\$ 1.36	\$ 871.36	\$ 5,012.61
16717	CMA Consulting	\$ 1,114.25	\$ 29.42	\$ -	\$ 1,143.67	\$ 3.66	\$ 2,344.75	\$ 13,488.42
22925	Cynthia Mathews	\$ 1,854.50	\$ -	\$ -	\$ 1,854.50	\$ 0.61	\$ 390.21	\$ 2,244.71
19184	Dale Howard	\$ 2,120.00	\$ 0.42	\$ 544.03	\$ 2,664.45	\$ 0.88	\$ 560.63	\$ 3,225.08
16124	David Leonard	\$ 1,425.00	\$ -	\$ -	\$ 1,425.00	\$ 0.47	\$ 299.84	\$ 1,724.84
16318	Deli Planet, Inc.	\$ 2,485.00	\$ -	\$ -	\$ 2,485.00	\$ 0.82	\$ 522.87	\$ 3,007.87
23487	Desert Restaurant Group, LLC	\$ 4,103.75	\$ -	\$ 95.63	\$ 4,199.38	\$ 1.38	\$ 883.60	\$ 5,082.98
22583	DF, LLC	\$ 6,417.50	\$ 8.80	\$ -	\$ 6,426.30	\$ 2.11	\$ 1,352.16	\$ 7,778.46
23582	Douglas R. Eisner	\$ 693.75	\$ 825.00	\$ -	\$ 1,518.75	\$ 0.50	\$ 319.56	\$ 1,838.31
23948	Dustin Metcalf	\$ 1,360.00	\$ 388.50	\$ 117.19	\$ 1,865.69	\$ 0.61	\$ 392.56	\$ 2,258.25
17873	Dwight & Barbara Mecherney	\$ 6,376.25	\$ 400.00	\$ 6.00	\$ 6,782.25	\$ 2.23	\$ 1,427.06	\$ 8,209.31
17983	Eilezer Mizrahi	\$ 2,673.74	\$ -	\$ 255.15	\$ 2,928.89	\$ 0.96	\$ 616.27	\$ 3,545.16
19745	Elliot A. and Anita B. Harris	\$ 917.50	\$ 134.18	\$ 87.51	\$ 1,139.19	\$ 0.37	\$ 239.70	\$ 1,378.89
16271	Evergreen International Aviation	\$ 4,580.00	\$ 85.00	\$ 906.25	\$ 5,571.25	\$ 1.83	\$ 1,172.25	\$ 6,743.50
10796	Familian Development Group	\$ 3,225.00	\$ -	\$ -	\$ 3,225.00	\$ 1.06	\$ 678.58	\$ 3,903.58
23744	Forever Green NV, a Nevada corporation; I. Heidi Loeb Heperich	\$ 13,023.75	\$ 536.43	\$ 141.65	\$ 13,701.83	\$ 4.50	\$ 2,883.02	\$ 16,584.85
23921	Frank J. Canzari	\$ 1,127.00	\$ -	\$ -	\$ 1,127.00	\$ 0.37	\$ 237.13	\$ 1,364.13
21821	Frias Holding Company	\$ 1,625.00	\$ 41.00	\$ -	\$ 1,666.00	\$ 0.55	\$ 350.54	\$ 2,016.54
20024	G2 Game Design, LLC	\$ 7,500.00	\$ -	\$ -	\$ 7,500.00	\$ 2.47	\$ 1,578.08	\$ 9,078.08
23047	Gerald Thomon	\$ 3,510.00	\$ -	\$ -	\$ 3,510.00	\$ 1.15	\$ 738.54	\$ 4,248.54
20289	Gerardo Borrego	\$ 2,650.00	\$ 1,435.33	\$ 20.85	\$ 3,656.18	\$ 1.20	\$ 769.30	\$ 4,425.48
23944	Greenwood Hall, Inc.	\$ 2,650.00	\$ 61.98	\$ -	\$ 2,711.98	\$ 0.89	\$ 570.63	\$ 3,282.61
23642	H2O Conservation Ltd.	\$ 1,937.50	\$ -	\$ -	\$ 1,937.50	\$ 0.64	\$ 407.67	\$ 2,345.17
23961	Howard L. Abselet	\$ 21,978.75	\$ 604.54	\$ 1,870.43	\$ 24,453.72	\$ 8.04	\$ 5,145.33	\$ 29,599.05
24088	iPro, Inc.	\$ 2,303.00	\$ 673.46	\$ -	\$ 2,976.46	\$ 0.98	\$ 626.28	\$ 3,602.74
22501	JA Energy	\$ 1,170.00	\$ -	\$ -	\$ 1,170.00	\$ 0.38	\$ 246.18	\$ 1,416.18
21373	Jean Phillips	\$ 3,000.00	\$ -	\$ 235.00	\$ 3,235.00	\$ 1.06	\$ 680.68	\$ 3,915.68
21267	John J. Cahill, Public Administrator	\$ 1,656.50	\$ -	\$ -	\$ 1,656.50	\$ 0.54	\$ 348.55	\$ 2,005.05
17768	John Kilpatrick	\$ 7,055.00	\$ 378.00	\$ 2,215.03	\$ 9,648.03	\$ 3.17	\$ 2,030.05	\$ 11,678.08
24137	John P. and Kimberly L. Furlong	\$ 2,619.50	\$ -	\$ -	\$ 2,619.50	\$ 0.86	\$ 551.17	\$ 3,170.67
17788	Jonathan Bakari	\$ 2,040.00	\$ 75.00	\$ -	\$ 2,115.00	\$ 0.70	\$ 445.02	\$ 2,560.02
19963	Joyce Issac	\$ 1,800.00	\$ -	\$ -	\$ 1,800.00	\$ 0.59	\$ 378.74	\$ 2,178.74
21622	Julie Summerville	\$ 2,872.00	\$ 792.66	\$ -	\$ 3,664.66	\$ 1.20	\$ 771.08	\$ 4,435.74
23449	Kexuan Yao and William Thompson	\$ 6,074.75	\$ 723.94	\$ -	\$ 6,798.69	\$ 2.24	\$ 1,430.52	\$ 8,229.21
17560	Luis & Luz Munoz	\$ 5,512.50	\$ 236.84	\$ 121.59	\$ 5,870.93	\$ 1.93	\$ 1,235.31	\$ 7,106.24
23991	Mark Stiffler	\$ 2,330.00	\$ -	\$ -	\$ 2,330.00	\$ 0.77	\$ 490.26	\$ 2,820.26
23765	Michael Price and Danielle Price	\$ 1,852.00	\$ -	\$ -	\$ 1,852.00	\$ 0.61	\$ 389.68	\$ 2,241.68
23079	Michael B. Eckerman	\$ 12,221.53	\$ -	\$ -	\$ 12,221.53	\$ 4.02	\$ 2,571.54	\$ 14,793.07
		\$ 7,394.14	\$ -	\$ 69.77	\$ 7,463.91	\$ 2.45	\$ 1,570.49	\$ 9,034.40

EXHIBIT 1



Glenn Number	Defendant(s)	PCS	Costs	Preparation Interest	Pre-Paid Sum	Daily Rate	Interest Accrued 01/03/15 thru 10/31/16	Total
20877	Michael Duncan	\$ 5,365.14	\$ 273.65	\$ 2,055.98	\$ 7,694.77	\$ 2.53	\$ 1,619.06	\$ 9,313.83
24021	Michael Mosca	\$ 1,235.00	\$ -	\$ -	\$ 1,235.00	\$ 0.41	\$ 259.86	\$ 1,494.86
18053	Michael Reiss	\$ 3,555.00	\$ -	\$ 497.98	\$ 4,052.98	\$ 1.33	\$ 848.58	\$ 4,881.56
23641	Milton Christenson	\$ 10,570.27	\$ 845.01	\$ 408.06	\$ 11,823.34	\$ 3.89	\$ 2,487.76	\$ 14,311.10
21405	Moment & Associates, Inc.	\$ 5,240.00	\$ 270.90	\$ 162.49	\$ 5,673.39	\$ 1.87	\$ 1,193.74	\$ 6,867.13
24016	Mountainside Health Center NV, LLC	\$ 1,275.00	\$ -	\$ 2.48	\$ 1,277.48	\$ 0.42	\$ 268.80	\$ 1,546.28
23740	Mountainside Health Center NV, LLC	\$ 5,195.00	\$ -	\$ -	\$ 5,195.00	\$ 1.71	\$ 1,093.08	\$ 6,288.08
19895	Nannies & Housekeepers, LLC	\$ 13,477.10	\$ -	\$ -	\$ 13,477.10	\$ 4.43	\$ 2,835.73	\$ 16,312.83
23762	Nevada Alliance of Boys & Girls Clubs	\$ 4,285.71	\$ 422.01	\$ -	\$ 4,707.72	\$ 1.55	\$ 990.56	\$ 5,698.28
22073	Nevada Association of Health Facilities	\$ 4,000.00	\$ 652.33	\$ -	\$ 4,652.33	\$ 1.53	\$ 978.90	\$ 5,631.23
24024	Patricia Ann Thomson	\$ 1,207.50	\$ -	\$ -	\$ 1,207.50	\$ 0.40	\$ 254.07	\$ 1,461.57
21975	Pemberton Fine Wine and Spirits, LLC	\$ 1,694.05	\$ 659.61	\$ 340.59	\$ 2,694.25	\$ 0.89	\$ 566.90	\$ 3,261.15
23530	Prestige Capital Fund, LLC	\$ 17,426.95	\$ 2,814.13	\$ 2,171.84	\$ 22,412.92	\$ 7.37	\$ 4,715.92	\$ 27,128.84
22400	Public House Las Vegas LLC	\$ 3,306.25	\$ 1,382.26	\$ 1,499.16	\$ 6,187.67	\$ 2.03	\$ 1,301.95	\$ 7,489.62
23174	Rainbow Andreani	\$ 1,150.00	\$ -	\$ 37.50	\$ 1,187.50	\$ 0.39	\$ 249.86	\$ 1,437.36
19308	Rainbow Hotel, LLC	\$ 12,573.75	\$ 10.82	\$ -	\$ 12,584.57	\$ 4.14	\$ 2,647.93	\$ 15,232.50
23950	Ray O'Donnell	\$ 3,540.00	\$ -	\$ -	\$ 3,540.00	\$ 1.16	\$ 744.85	\$ 4,284.85
18385	Rhonda Mushkin	\$ 1,013.75	\$ -	\$ 33.47	\$ 1,047.22	\$ 0.34	\$ 220.35	\$ 1,267.57
22271	Robert and Molly Hamrick	\$ 7,163.75	\$ 1.00	\$ 678.98	\$ 7,843.73	\$ 2.58	\$ 1,650.41	\$ 9,494.14
19105	Ronald & Audrey Tassinari	\$ 1,207.50	\$ -	\$ -	\$ 1,207.50	\$ 0.40	\$ 254.07	\$ 1,461.57
14919	Scott Sibley	\$ 1,270.00	\$ 21.00	\$ -	\$ 1,291.00	\$ 0.42	\$ 271.64	\$ 1,562.64
24040	Sheila M. Matherly	\$ 3,110.00	\$ 436.00	\$ -	\$ 3,546.00	\$ 1.17	\$ 746.12	\$ 4,292.12
23795	SRS Holdings	\$ 3,048.00	\$ -	\$ 84.81	\$ 3,132.81	\$ 1.03	\$ 659.18	\$ 3,791.99
23927	Sterling Senior Communities	\$ 5,000.00	\$ -	\$ -	\$ 5,000.00	\$ 1.64	\$ 1,052.05	\$ 6,052.05
23885	Sunline Universal Co., Ltd.	\$ 4,387.50	\$ -	\$ 43.88	\$ 4,431.38	\$ 1.46	\$ 922.41	\$ 5,353.79
23337	T.A.C.T. USA Inc.	\$ 525.00	\$ 571.97	\$ 34.81	\$ 1,131.78	\$ 0.37	\$ 238.14	\$ 1,369.92
17613	Ted and Cheryl L Lachowicz	\$ 1,793.00	\$ 44.00	\$ -	\$ 1,837.00	\$ 0.60	\$ 386.52	\$ 2,223.52
19753	Thomas M. McIntosh, Attorney at Law	\$ 6,530.00	\$ 110.04	\$ -	\$ 6,640.04	\$ 2.18	\$ 1,397.14	\$ 8,037.18
23644	Tracy Westen and Linda Lawson	\$ 17,842.00	\$ -	\$ 466.81	\$ 18,308.81	\$ 6.02	\$ 3,852.37	\$ 22,161.18
24051	Waterton Global Value, L.P. & Borealis Mining Co. LLC	\$ 15,115.30	\$ 172.18	\$ -	\$ 15,287.48	\$ 5.03	\$ 3,216.65	\$ 18,504.13
23928	Wet Roults LLP	\$ 2,877.50	\$ 26.17	\$ 26.75	\$ 2,930.42	\$ 0.96	\$ 616.59	\$ 3,547.01
19155	Whittier Trust Company of Nevada	\$ 4,506.25	\$ 0.69	\$ -	\$ 4,506.94	\$ 1.48	\$ 948.31	\$ 5,455.25
24098	Yunli Moy	\$ 4,954.50	\$ 313.56	\$ -	\$ 5,268.06	\$ 1.73	\$ 1,108.46	\$ 6,376.52
TOTALS:		\$383,239.86	\$19,084.35	\$ 22,135.57	\$ 424,459.78	\$ 139.55	\$ 89,310.99	\$ 513,770.77

EXHIBIT 1